

UNITED STATES DISTRICT COURT

for the

WESTERN District of TENNESSEE

Division

<p>Laquinta Partee</p> <p><i>Plaintiff(s)</i> (Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)</p> <p style="text-align: center;">-v-</p> <p>STEPHERSON, INC dba SUPERLO FOODS LaTanya Owens ("GM"), JR Stepherson ("HR"), Lola Rodgers ("Rodger"), Jeremy (last name unknown) ("Jeremy"), Andrea (last name unknown) ("Andrea") <i>etc.</i></p> <p><i>Defendant(s)</i> (Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)</p>	<p>Case No. _____ <i>(to be filled in by the Clerk's Office)</i></p> <p>Jury Trial: (check one) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Laquinta Partee1</u>
Street Address	<u>1868 Vandale Avenue</u>
City and County	<u>Memphis in Shelby County</u>
State and Zip Code	<u>Tennessee and 38117</u>
Telephone Number	<u>6159877145</u>
E-mail Address	<u>LE.PARTEE@GMAIL.COM</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

JR Stepherson
Human Resources
5150 American Way
Memphis in Shelby County
Tennessee and 38115
901-794-0058
jr@superlofoods.com

Defendant No. 2

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

LaTanya Owens
General Manager
5150 American Way
Memphis in Shelby County
Tennessee and 38115
901-683-5594
jr@superlofoods.com

Defendant No. 3

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

Lola Rodgers
Manager
5150 American Way
Memphis in Shelby County
Tennessee and 38115
901-683-5594
jr@superlofoods.com

Defendant No. 4

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

Kandis Banks
Manager
5150 American Way
Memphis in Shelby County
Tennessee and 38115
901-683-5594
jr@superlofoods.com

Produce Worker
4751 Quince Road
Memphis, TN 38117

Defendants

Stephenson, Inc

②5. Angela Myers
Cashier
4751 Quince Road
Memphis, TN 38117

⑥ James Dixon
General Manager
3327 N. Watkins Street
Memphis, TN 38127
901-357-7617

⑦. Jeremy (last name unknown)
Assistant General Manager
4751 ~~American Way~~ Quince Rd
Memphis, TN 38117

⑧. Michelle (last name unknown)
Manager and Customer Service
3327 N. Watkins Street
Memphis, TN
901-357-7617

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Tennessee Right To remedy Clause

Tennessee Human Rights Act

The Age Discrimination in Employment Act of 1967 (ADEA)

Sections 102 and 103 of the Civil Rights Act of 1991

"SEC. 1977A. DAMAGES IN CASES OF INTENTIONAL DISCRIMINATION IN EMPLOYMENT. [42 U.S.C. 1981a]

"(a) RIGHT OF RECOVERY. -

"(1) CIVIL RIGHTS. - In an action brought by a complaining party under section 706 or 717 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-5) against a respondent who engaged in unlawful intentional discrimination (not an employment practice that is unlawful because of its disparate impact) prohibited under section 703, 704, or 717 of the Act (42 U.S.C. 2000e-2 or 2000e-3), and provided that the complaining party cannot recover under section 1977 of the Revised Statutes (42 U.S.C. 1981), the complaining party may recover compensatory and punitive damages as allowed in subsection (b), in addition to any relief authorized by section 706(g) of the Civil Rights Act of 1964, from the respondent.

Vance v. Ball State University, 133 S. Ct. 2434 (2013)

Under Title VII of the Civil Rights Act of 1964 prohibits sexual harassment in the workplace

Under 28-3-104 Personal Tort Actions; Actions against certain professionals CFR 1604.11 (a)(1)

Under 28-3-103 Slander Actions

Under 42 U. S. C. §2000e-3(a) for retaliatory harassment actions and/or conduct and retaliatory behavoir actions and/or conduct, as I was fired for reporting my sexual harassment and Jasmine Malone to JR Stepherson investigation

29 CFR § 1604.11 (a)(1);

42 U.S. Code § 2000e-2 - Unlawful employment practices (a) (1)(2);

Article I, Section 17 of the Tennessee Constitution

First Amendment I was stopped from recording and then documenting after I stopped video recording;

Facially discriminatory conduct and hostile sexual jokes.

Using code words to initiate harassment in the workplace;

I was used to show what happens when you make a complaint;

The environment was very unwelcoming in SuperLo Foods and this spread to my schooling, my kids schooling, my home and my shopping and coming outside;

Sterotyping for people to harm me and my kids any way possible to stop the filing of this case

People faking and posing as regular people are trying to get dirt on me and harm either is sufficient to these people;

Protected activity violations were malicious, reckless, intentional, and harmful to my reputation and Page 4 of 8

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) NA , is a citizen of the
State of (name)

b. If the plaintiff is a corporation

The plaintiff, (name) , is incorporated
under the laws of the State of (name)
and has its principal place of business in the State of (name)

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) , is a citizen of
the State of (name) . Or is a citizen of
(foreign nation)

b. If the defendant is a corporation

The defendant, (name) , is incorporated under
the laws of the State of (name) , and has its
principal place of business in the State of (name)
Or is incorporated under the laws of (foreign nation)
and has its principal place of business in (name)

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I was sexually harassed by Kandis Banks. She asked me for a threesome I turned her down and then she offered to pay. I turned this down. On Feb. 13, 2024 she bumped me sexually and flirted but I was rejecting her again.

I was hit, my car was vandalised, and I am currently being stalked and followed.

Managers had police officers come in and flirt with me on duty Lt. Williams and Officer Mitchell.

Managers had security guards calling me foul language and racial slurs.

I was told not to record the events and to stop documenting at work my managers.

I reported a sexual harassment claim with Jasmine Malone.

I was asked about my future work desire on March 29, 2024 around 3 pm by HR and the GM of Stephenson dba SuperLo Foods. I said accounting at SuperLo Foods. I was told there is no accounting department at SuperLo Foods. I was transferred to another location where racial slurs and rumors were spread in the store and among customers. said General Manager James Dixon and Michelle.

It was turned into a hostile work environment. Managers and employees started retaliatory behavior and nothing was done. The managers had me stalked and followed to not move forward with a suit knowing I was documenting to have a case after many instances of aggressive actions by managers, employees, and security.

After many complaints to human resources I was fired.

See attached documents for more details.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Title VII Civil Rights Acts of 1964 ("Title VII")

and Tennessee Human Rights Acts ("THRC")

TN Code 29-39-104 (a)(1-4)(7)Punitive Damages

TN Code 20-39-104 (b) Punitive for Vicarious Liability

Injunctive relief to prevent following and surveillance of me and my family under False Claims given to the Memphis Police Department by the Superlo Foods managers Andrea and LaTanya Owens.

Compensatory damages for loss of employment and back pay and damages for not receiving unemployment

Stigma and stereotype damages for the rumors spread throughout Memphis, TN by SuperLo Foods that put my life and kids life in danger.

Punitive damages in the amount \$30 million for the time in education progress lost;

M2012-00890-SC-R11-CV

Following and stalked and damage to my vehicle;

and damages for the vicarious liability, negligent, reckless, willfull, outrageous misconduct and sexual harassment orchestrated by LaTanya Owens over the intercom and Andrea behind closed doors with Alicia Amrstrong as a witness.

Tuition expenses for college and private schooling and/or home schooling paid for.

Also, as a loss of work schedule changes made by SuperLo Foods managers starting Feb 15, 2024 to stop me from attending classes and stop me from homeschooling my kids.

The overall conspiracy with Larry Banks CPA Firm to hire me and fire and have me without employment and school and future degrees as an Accountant opportunities.

For fear installed in other employees who would not help me because of the actions the witnesses and will not speak up.

The conspiring with the Southwest TN Community College admissions, grant representatives of admissions, professors, and staffed employees of Memphis Board of Education of Shelby County during the course and after the course of my employment with SuperLo Foods.

For bringing a grocery basket to my house and leaving it as a threat.

For having police and MATA bus drivers pose as Uber and Lyft drivers to scare me from moving forward with any case against SuperLo Foods.

Using FedEx Express airplanes as distraction to be too tired to prepare documents and move out of town.

For having a white female druggie named Wendy follow and report my whereabouts from my home and corner stores.

Working with informants to leave, shine bright lights, and drive by my house and kids when playing outside hunting magazines at my home.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Harassment Complaint Filed with managers

On Feb 14, 2024, my son and I walked into SuperLo Foods 4751 Quince Road, Memphis, TN 38117 around 7:45 a. We were followed by Kimberly Johnson, security guard who is interested in both sex from Clarion Security, 1780 Moriah Woods Blvd #1, Memphis, TN 38117. We were told to take off our hoods and my son's backpack, he is age nine. I said, "I work here. We just worked together last night." We took off our hoods and turned away. Seconds later, I turned around to continue shopping with my son and she was still following us by our side not leaving. I went to leave my son's backpack at the customer service booth with the manager Lola to make a statement, but she ignored the harassment complaint. I asked for the general manager, but she stated the GM was unavailable. I refused to shop and left the store with my son. I returned later for work. I attempted to call and make a complaint but Lola answered and then hung up when I asked to speak to LaTanya Owens, GM.

February 16, 2024, in the meeting about the subject LaTanya Ownes asked me to rewrite the complaint addressing Kandis Banks only to hide the fact managers do not take complaints from me. This action was to remove the discrimination complaint of Lola and her not taking complaints from darker workers like me about being harassed. It also stated SuperLo Foods managers Andrea, Jeremy, and LaTanya were hiring new workers to unadvertised open positions in the store. I aske dto be in the customer service position guaranteeing that all the cash that came from customers would go straight into the register if she hired me. Money would not come up missing as it had been. Instead , for example, Kimberly Venegas, young Spanish female, was rehired as a worker in into a full-time customer service position January or February 2024. Kimberly Venegas is on military reserve who is a SuperLo Foods cashier like me but whose presence was used to stop me from working in customer service. Also, she was immediately hired back after SuperLo Foods had fired three dark skin African American employees Tyree, Shantriece, and Shawanda.

In early February I confided in the assistant manager Andrea to handle my earlier request to speak to Kandis Banks about her ongoing sexual advances. I did ask to speak to Andrea in private, but she refused.

Kandis asking me for a threesome that I had refused in front of other employees Days later, I returned to work wearing large black office pants. She asked again that I have a threesome with her and her boyfriend, I turned her down and clocked in. When she walked it inside the customer service booth, she yelled out. "I still can see. You ain't hiding nothing." After this incident she steady make comments about how she goes both ways and how she [I] get [s] what she want. She [I] help folks move up when she gets [I get] what [she] I want."

Seeing how she had become aggressive I needed to make it clearer I was not interested and on February 15, 2024, I was told to use a white copy sheet of paper to make statement. I did this while she was not at work in fear of retaliation or an altercation from her being upset from it. Also, because I knew she had followers in support of her actions. For example, as Kandis Banks and K.T. aka Kenneth Hurley made sexual remarks and use curse words about sex Andrea the assistant manager found it humorous. I wrote a statement and went over it with the managers Andrea and LaTanya in an office meeting on February 16, 2024, during my shift. LaTanya said she would talk to Kandis Banks and security was not harassing me. I disputed this with facts.

I informed them that upon cash pick ups Kandis Banks approached me asked me to go a concert and somewhere where can alone her but I told her I did not want anything to do with whatever she had going on and stepped back, so she get the register cash. I was uncomfortable and shocked she had come where I was right after I made the complaint to Andrea.

On or around February 17, 2024, I was told by Andrea Jeremy wanted me to train my replacement a new cashier named Jasmine Malone, young African American female. About an hour later or so ,I was removed from all registers and placed in the of the back of the store to work with corporate as

they stocked (Gary and another man both older white men) doing more tedious and labor. Picking up boxes up cans and bags of foods. Then placing items on high shelves alone. I pulled Gary to the side and said I believe I am being punished for making a complaint against Kandis Banks for sexual harassment. He said to contact JR of human resources but did not provide a way. I then went to Andea told her I believe this was retaliation for making a complaint against Banks and LaTanya and Lola. She said it was not and I was just picked because I was a trusted worker.

As I worked days after I started being targeted by managers with employees reaching down by legs acting to get things from under my register as I stood there and without notice. Or reaching so fast that I would be irritated with the invasion of space and feeling sexually violated.

Intimidation to feel Unwanted and Watched

Police Incidents

On February 28, 2024 Wednesday at 8:33 am I had dropped my son off at Willow Oaks Elementary and I noticed I was being watched by a police officer in a police car parked directly in view of my son's school and behind a church next to the school. As I left the property there were another two police cars parked on Willow Road. Not only did my kids go to this school but it is a main connecting street to where my mother's house. ~~is~~ Dearing Road off Mallory. These streets cross each. She lives three minutes from the store and her house is on the same street as my son's school. This was intimidation in retaliation for me ~~to~~
~~to~~
~~with~~ ^{to} feel unwanted in the entire community within proximity of SuperLo Foods. I ~~was~~ a moving target. This time they did not come into the store harassing me because I was ~~I~~ off (no schedule) this day. Therefore, they waited for me to pass to see my tags and pull me over.

On February 28, 2024, at 8:36 am I noticed two more police cars parked on Willow as I left the area. They were about 12 to 25 feet parked apart. No sirens. Nobody was pulled over. None of these three cars were acting as crossing guards.

Larry Banks CPA Firm

May 5, 2024 I went to shop at 4751 Quince Road SuperLo Foods. LaTanya was at work. I arrived at my

^{then}

son's school ~~and~~ two police cars were sitting on the corner of the grass. I saw another sitting on the church parking lot behind the church on the same side as my mother's home Dearing Rd. Larry Banks CPA Firm

May 9, 2024 Thursday, I went to pick up my paycheck. I was an hour late. I saw a white police lady sitting in the middle of the turning lane by my job not near the police station. I passed her and took out my phone then she pulled off. I contacted Internal Affairs on May 9, 2024, around 1:00 pm. I made a complaint against Lt. Williams and Officer Mitchell for retaliation for SuperLo Foods, a police car of a Spanish female parked across from my car upon leaving out of SuperLo Foods located by Maria Street in North Memphis. I sat in the car for minutes and went face to face passing her in my vehicle she pulled off. As I went down the next street I was being chased by two officers in one police car by Kingsbury school. I pulled over to take a video and the police ran the stop sign and made a U-turn at high speed in the middle of street while cars were traveling, too. On May 10, 2024, No Parking signs were put up on Perkins by 4751 Quince Road SuperLo Foods, my daughter's school, where MPD has sat a police car empty for intimidation. No Parking are not in accordance with the Fourth Amendment solely because they are being used for seizure of my vehicle and to conduct warrantless search ton the grounds of *Community Caretaking Action*. If the police officers have a female officer pull me over she search my body. find evidence signs on public streets where no one parks because it would obstruct traffic drastically. The signs should be taken down. I am being target for a *Community Caretaking Action. But this illegal United States v. Johnson. In retaliation for contacting Internal Affairs police are trying to impound my and plant drugs on me.*

During the week of May 6, 2024 I was entering the

Edited

SuperLo Foods retaliated against me for filing documentation of sexual misconduct, and comments about my private area and butt by Kandis Banks. Later SuperLo Foods has placed knowingly false statements written by workers into my employee file.

Racial Discrimination & Retaliation

At 4751 Quince Road SuperLo Foods store

March 1, 2024, I vented to Angela about being loud and physically defensive if one more person who worked at SuperLo Foods touched me (Kandis Banks). I was fed up and very upset.

March 3, 2024, between 11:57 am and 12:11 pm Sunday Angela wrapped her arms around me from the back. I was very upset after I had told her I wanted to snatch Lola Rodgers for hitting me in the back. I said I was tired of people touching n me and one more MF touch me it's going to be a problem.

Kimberly Johnson (white female cashier/customer service)

She receives special treatment. The black heavy set women have to work in more directly with the customers, especially rude customers. Black workers have to be responsible to handling management tasks as managers abandon their work duties to hold nonbusiness related conversations with friends and family.

Twenty minutes after the appearance and flirting by Lt. Williams and Andrea exiting with other officers LaTanya Owens called Nyasia (a person Kandis Banks asked for a threesome I told to HR)manager Andrea after talking I

March 3, 2024, Kimberly Johnson (Caucasian Female works customer service cashier occasionally) said she had just “received” her “first write up for a customer complaint” regarding her “language” being foul. Kimberly was written and kept her job as a cashier, but I was fired because of my race being an African American. I was fired after one false allegation from a customer at the SuperLo Foods on Watkins Rd by James Dixon, HR, and Michelle. She teased maliciously about not knowing ^{and not} or caring about the prohibited use of profanity being prohibited and offensive.

Picture of the N word

SuperLo Foods managers should have known about this because we use our produce sheet multiple times a day. Many vegetables do not scan or weigh up. Kimberly Johnson knew I was getting. She is using her produce sheet.

Racial Segregation and Retaliation

Employees would be scheduled to work around my hours but would be taken away from the registers while I had to work the entire time. I would be called back to work the register and white workers and male workers would be moved to other areas. It looks like we were scheduled together so we were at work on the registers together but that is not the case.

20240303 12pm - Setup - Hostile environment - K Johnson mentions her 1st write up was today for a customer complaint.mp3 - Google Drive

March 3, 2024 12:01 pm Kimberly Johnson (cashier) watched Angela Myers wrapped her arms around me.

March 4, 2024, at 8:40 am I did not see LaTanya Owens green Jeep parked where the managers park. It was not on the lot at this time. LaTanya did start working only the shifts I worked. I went inside of SuperLo Foods 4571 Quince Road to get a picture of my scheduled shifts. I believe I was watched on the camera before entering the building because I saw the produce supervisor Michael Birdsong standing on aisle 8 right behind the cash registers area. Produce is in a different direction, and he was nowhere near this area. He was facing me, and we made eye contact with his phone in his hand.



At 8:41 am I reached the meat area and there were three more employees directly in front of the break room where the schedule is. Sarah Lyons who works in the meat department and two white men in front of the break room where the schedule is. One of the men was a white meat department worker who did

not want me to see his face. He put his head down. In the back at the box machine was the white cashier, Sara Russell. Sara Russell was moved from cashiering whenever I come to work after Feb 15, 2024.

Attempt to segregate me from white workers and males who are cashiers I have worked 8 hour shifts with since September 2023 when I started.



No bathroom Break

On March 3, 2024, around 8:55 pm I was speaking with Titiana about how we should get together and make formal complaint about our drawers. I warned Titiana to be more careful of Andrea because as I

walked to put items away by the deli area Vaughn Andrea had told Vaughn, "Them hoes ain't my friends," when joked that he thought she was still in the front with her friends (the cashier workers). Titiana texted Andrea when I finished, and Andrea came to the register stopping from conversant with Titana. Titana said I don't want to talk cause somebody always going to the office making complaints.

Minutes later, I went to the back of the store and Titana called me back to the front over the intercom but when I came back no one was there. Minutes later, I saw Titana, Andrea, and Javier , Hispanic cashier who works in customer service, coming in from outside.

On March 3, 2024, around 9:05 pm I went to the bathroom and was followed by Melvin an African American male who works in produce. Melvin knocked on the lady's bathroom after I went in the door, but the men was empty. Seconds later, Andrea had then called my name to over the intercom come back to the register.

Followed

March 3, 2024, A light skin female Clarion Security guard went outside around 3:55 pm and moved her to car next to mine. She waited on me to get off in her car after she had parked her car next to mine. As I cranked up my car she watched from her back of seat instead of driver seat. I reached for my phone, and she got out of her car. As I pulled off, I saw her going back into the building. Her name unknown because she refused to tell me her name. SuperLo Foods hires people with the same name or close as possible to make it difficult to pin point people who do retaliation for them.



Attempts to segregate me from the white workers, light skin workers, and males cashiers AND LaTanya Ownes and Jeremy said there were no openings in the daytime in March 2024. I was pulled into he office about being off and she wanted me to change my availability. I asked for the daytime and she said no. The following shows she hired Spanish workers and white workers to work in the daytime instead of me. I said I needed it for school and my kids. She said I could not have the daytime.

Laquinta Partee

I work *Sundays, Mondays, Wednesday, and Thursdays* as of March 2024.

Sunday March 3, 2024

I am scheduled for Sunday March 3, 2024 12 pm to 7

(vs New Hire Jasmine Isaac left at 2 pm, was given an extra hour to come in before me, so when I walk in no matter how strong I am trying to show it still hurt to see how far people go to hurt other people.

- Angela Myers left 4 pm Deliberately laid around me after being told how much I did not like what was going on with people touching me. I told I was going to do something to the next person and then I was going to be

-John Pope not working

-Sara Russell left at 2

-Trevor "Trey" Thomas 4 pm to 9 pm

March 3, 2024 On paper it looks like worked together but we didn't. I was shocked to see Trevor at work and more surprised he only came to the register after my shift was ended. He approached as I logged off my computer. I asked him, "You about to log on?" He answered, "Yeah." Then Kimberly Johnson (white cashier from customer service stopped us from conversating by giving Trevor an item to putback.

(Trevor's name was changed on the schedule from a government name to a nickname in March 2024 "Trey"). He was scheduled different hours from me and when we did have the same hours or close he was removed from the area I worked in. Moved to the stocking area when I did not take the option from J.R. human resources.

20240303 12pm - Setup - Hostile environment - K Johnson mentions her 1st write up was today for a customer complaint.mp3 - Google Drive

Kimberly Venegas – Customer Service and put back and separated by Daria, Mark A. Vernon 11 am to 7 pm (moved to the stocking area when I did not take the option), Arneisha Wright Not Working,

Monday March 4, 2024 2 pm to 10 pm

Thursday March 7, 2024 4 pm to 9 pm

Friday March 8, 2024 12 pm to 7 pm

All white workers, light skin black worker's and all the male cashiers were removed from my scheduled hours and/or heavily reduced from cashiering while I worked as a cashier the same day

Gary Allen (Possibly Scott)

Sunday, March 3, 2024, 7 am to 1 pm (Scott I believe but he is a cashier sometimes, works in Floral)

Earnest Aiston (I don't know currently)

Sunday March 3, 2024 Wednesday March 5, 2024 Off -

Juan Chagolla

Sunday March 3, 2024 Off

Tuesday March 4 and Wednesday March 5, 2024 8 am – 2 pm

Thursday, Friday, and Saturday March 6, 7 and 9, 2024 Off – Juan Chagolla

Angela Myers

Sunday March 3, 2024 — 10 – 6 pm, March 4, 2024 Tuesday 6 am to 1 pm, March 5, 2024 9 am to 3 pm.

Javier Gallegos

Cashier (But works all of his shift in customer service)

Sunday, March 3, 2024 1 pm to 9 pm in Customer Service

I was told I could not work in the daytime but new hires work in the daytime

Jacqueline Harris

Sunday 10 am to 6 pm

Jasmine Isaac

I was taken off the register and told to train Jasmine Isaac a new young light skin woman as a punishment for reporting Andrea, Lola, LaTanya, and Kandis in February 2024 at this time multiple issues were happening as retaliation and discrimination.

Sunday March 3, 2024 11 am to 7 pm

Wednesday March 6, 2024 10 am to 6 pm

Zoe Jenkinszx

Sunday March 3, 2024 8 am to 3 pm, March 4, 2024 7 am to 2 pm

Sara Russell

6 am 2 pm, Kimberly Shields and Terrika removed from Mondays Paulina Flores Mena, On March 4, 2024, John was not stocking or working hard, and this is because I was not scheduled to work until 2:00 pm until 10 pm. When I am at work, after the Feb. 15, 2024, and others I was taken off the schedule of working with men and white workers by LaTanya Owens and Jeremy. These two make the schedules. Zoe

Scheduled with them on paper but not physically

No baggers

Camron Johnson

March 3, 2024 9 am to 4 pm but was not really available to bag for me

March 4, 2024 No Schedule

Kimberly Johnson

Stepherson

To force me to work constantly employees started checking out at my register more than usual. To make me paranoid and uncomfortable employees would get to close to me violating my personal space and walk back and forth fast around me being intimidating.

Constant reaching by my legs under my register

On March 25, 2024, at 9:59 am John Pope came to reach by my legs to get items. I stopped him and explained the best way to do this. He acted as if he was going to bag for me but did not.

Violating my body's personal space

2024_03_25_09_44_38

March 25, 2024, Anita put items from her cart 20 feet away on my register counter. I asked to my space for me to items, but she refused. We went back and forth about me needing my space, but she got upset saying why you acting like. I'll be right back. I asked to put the items in her cart, but she huffed and rolled eyes and walked away. We were in front of customers. I removed them but she came back and put more items there. I removed them and put them on her cart and put away item basket. This was retaliation.

Transferred by HR and LaTanya. You have no choice HR said.

On March 27, 2024, HR and LaTanya had called me up to the Quince Road location office. HR insisted on a nickname as his legal name. HR J.R. never provided his real name. HR J.R. asked many questions one was "where do you want to be in the next 10 years." (Completely unrelated this was a setup to say I would never have an accounting position within the company nor a customer service position).

by me. Security, Scott, and Stephanie, one of the owners, finally went to the floral and were laughing about something. Titana worked register 1, Zoe, white female, worked register 2, Daria worked register 3. I had moved to register 4 around 1:26 pm. 1:29 pm, I worked register 5 Thomas, white male meat department, walked by constantly. At 1:30 pm Kimberly Johnson, African American female security guard, constantly made an intimidating presence. She gave me dirty looks after I made the complain against her for harassing my son and I on February 15, 2024. At 1:31 pm Anita came walking back and forth being intimidating.

In retaliation

Baggers light skin workers and whites and males of any race are removed from cashiering. Surrounded by hostile females who were taking over my personal space.

J. R. did not want to investigate any claims, he was dragging his feet waiting for complaints stack up to say he had a lot of complaints from me.

 **May 15, 2024**

I had went to Wendy's a few days prior with my kids. During my drive down tm ext. Perkins and Poplar Avenue a SuperLo Foods employee stood on the corner at ext. A male officer was in a MPD police car pulled out to let me see his car but not his face as I turned.

 **May 16, 2024**

I spoke to Larry Banks about not doing Orlando Davie's company records (1099s specifically) because Larry Banks told me to use any addresses Orlando Davie sends knowing they all would not be real addresses to send to the IRS. I said don't tell me to do something you would not do for your clients. He pretended not to remember he said to do it on 5-15-2024 after I spoke to Orlando Davie and his administrative assistant (supposedly).

SuperLo Foods attempts damaging my car.

May 16, 2024 8:40 am Larry Banks CPA

I arrived at Larry Banks office around 8:40 am on 5-16-24 He said he was giving me a bank statement for a new company but did not. He left the office around 8:45 am. The grass men started cutting grass back and forth in one section of approximately 7 sections of grass separated by concrete. When I went to the door to move my car the grass Spanish man stopped cutting and went to the truck parked the garbage can in view of my car. The grass cutters had been sitting watching my car since I arrived. They did not come to cut around my car until after Larry Banks left.

May 16, 2024 9:16 am

Larry Banks left and immediately Spanish workers started cutting grass by the front bumper of my car

See video.

Outside my House Work & School

May 16, 2024, around 6:59 am & 7:10 am

Sandra Marshall was parked directly across from my house in a white pick-up truck with MLGW Corporate Security sign on it. She was watching my car and waiting to see when I was leaving out too take my kids to school and go to work.

May 16, 2024, around 7:10 am to 7:18 am

I pulled out my driveway from 2489 Vandale Avenue Memphis, TN 38108 to a side treat MLGW sits on next to me. Every person that I passed who works for MLGW in a MLGW vehicle tried to hide his face. After noticing them in front of my house and seeing how each looked over to at my car (everyone was in a vehicle of MLGW).

On May 15, 2024

I noticed I was being followed by City of Memphis workers and the contractors they hire. They are using contractors with different companies to find my location and show up. I noticed a police car sitting in Sonic on the same side I drive down heading turn left onto Poplar Avenue.

On May 15, 2024

City of Memphis male worker received communication that I was at Family Dollar. He came and brung his son. Once he came in the store he looked the other way. When I went down the aisle he hid but left his son (around age 9 -11 years old) wondering and yelling to speak with him. I went down the hygiene aisle he hid on the next aisle over by the freezer section. I moved around the store and notice he still had not came to his son nor was he attentive to his son. He could not see his son and barely could hear him.

On May 16, 2024

Intimidation

As I type up stuff that is happening Larry has called me into his office. I saw Global Security Services in a blue truck with tinted windows through Banks window.

On May 16, 2024

Around 10:00 am I was typing on the computer as I opened my computer a client called interrupting my documenting named DeWayne Williams. He was placed on speaker. As I began speaking, he complained

it was hard to hear me. I moved the phone closer and continued the conversation. He is part of the setup against me.

Work given on sticky notes to me fro Larry Banks.

Marquia Taylor entering 640 for contractors I was told to correct.

The client, Carolyn Flamenco, left her bank statements at home, but Larry Banks gave a sticky note with a Mexican person's (Larry said) information to create a 1099.

Stepherson's Inc. d/b/a SuperLo Foods – Depth ties to State of Tennessee (which distributes unemployment benefits)

J.R.S. Human Resources Manager of SuperLo Foods

Information attained from Linked In directly

Attended University of Memphis

Significant connections to J. R. S Human Resources of Stepherson's Inc. d/b/a SuperLo Foods

Family member Ashley Harris Vice President of SuperLo Foods Directly related to the owners and Vice President

The race of the family operating the business reserves seats/positions for it's the family members during my employment

Approximately 845 employees under the Stepherson's Brand attained from J.R. S's LinkedIn Profile out of two SuperLo Foods

One created automatically by Linked In;

One created and updated by J.R.S.;

J.R.S. started with Stepherson's has over 300 direct connections to the University of Memphis's Linked In account Followers of at least 133,300;

National Grocers Association throughout the US. of America

Memphis International Airport

May 17, 2024 and ongoing

Starting with times of airplane sitting at the corner of MLGW empty field Dexter and Tupelo 6/1/2024

Woke up and used my phone 8:28 am

Airplanes sat over my house and then started moving

8:35 am	9:04 am	9:15 am
8:45 am	9:08 am	9:17 am
8:57 am	9:10 am	9:20 am
9:02 am	9:13 am	9:22 am
9:26 am	9:34 am	9:57 am
9:28 am	9:42 am	9:59 am
9:31 am	9:44 am	
10:02 am	10:13 am	10:20 am
10:10 am	10:14 am	
10:26 am	10:30 am	

After a phone call I made the helicopter stayed near my house

10:41 am	10:45 am	10:49 am
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10:51 am	11:58 am	12:32 pm
10:54 am	12:11 pm	12:35 pm
10:54 am another airplane	12:12 pm	12:55 pm
11:03 am	12:16 pm	3 in the 1:00 o'clock hour
11:24 am	12:26 pm	2:22 pm
11:40 approximately	12:30 pm	

Once I typed this they started detouring slightly

Helicopter

10:47 am

Train

9:29 am

woke and went to the bathroom

8:57 am – 4 planes positioned in close proximity

crossed my house exactly

Changed routes to fly over my home for disruption to my internet service and spy

Defamation – Rumors spread through the City of Memphis Purchased Mace

Retaliation - After May 24, 2024, I had to buy Mace and Pepper Spray products.

May 24, 2024

Filing Charges Main St. Downtown Memphis

When I went to file the charge against Angela Myers I had to be escorted. Other people came in who did not work there was given a visitor badge but went straight through to elevators. I was followed home.

5-25-2024 Kroger 3444 Poplar Avenue

I went to Kroger and as I shopped the Kroger white male older manager grabbed a basketball headed my way and cut me off.

I went to check out and the young boy bagger dug in his nose, gave me a nasty look, and then I stopped him from touching any of my bags. Filed a complaint online with customer service. Grocer Association with SuperLo Foods.

6/1/2024 Car repair at home

Once my car repairs were complete, I drove one block from Vandale Avenue and a right onto Tupelo to Jackson Avenue. There was a male white officer sitting feet from the traffic light.

Airplane

5:55 pm

6:08 pm

6/2/2024 Electronic Interference by scanner waves from old products

At Home

I woke up my neighbor were loud banging music

I opened the computer around 8:35 pm approximately

Cars started coming through with loud music

Store

I went B-52 market random people and workers walked stand coning to where I was

Cars pulled up behind me slowing me down

Men walked out the store in front of my car and the my door

The owner Ali came out the store following me to my car and pulled off to slow me down

A woman walked by my driver side door then across of my car

6-2-2024 Show of connections with deep influence, financial, safety warnings, restrictions on and ties

6-2-2024 More advertisements -

Knowledge Bowl News Channel 3 U of M President

More holding back of FASFA and problems with applica

Retention policy modified for 3rd graders

The past two weeks more car jackings near my home

More construction until I made

More walks up crimes, and the

Another complaint to the Mayor's Office through 311

Airplane 6/2/2024

Called to the police but Cxl and they still came

Phone call/Electricity & Static

1. Like an old-school cordless phone static when you have went to far from the main
 - 1.1. electricity flickered
 - 1.2. static very quick
 - 1.3. 2:42 pm neighbor pulled back up playing the loud music
 - 1.4.
2. MLGW corporate four door security truck was facing my house hid between generators and electrical boxes. Trucks sit on the other side of the building.
3. The MLGW security turned the inside truck lights on and off then the plane headed over my house
4. The second plane moved to the position of the first plane. It sat for two minutes and traveled over my home.
5. Police came out even though I cancelled the call. I saw them and waited with my back turned smoking a Jazz Black-N-Mild cigar without the filter broken in half. Two officers, white and black, males.

2:36 pm

2:38 pm

6-2-2024 Airplane

I went to the store around 10:20 pm

MLGW red truck slowly hiding behind the generators

Airplane 10:28 pm

6-2-2024 Went to smoke

Airplane 11:24 pm

Man came out of the dark into the corner house

All black heavy set not fat

6-2-2024 Internet Interception

Constant interruption on landline front television internet breaking 11:28 pm

June 3, 2024 Intimidation & Spy on MY company and me so I do not have anybody over

Helicopter flying over home with light on me

Helicopter 8:50 am – I was waking and went outside to put antifreeze and water in my car

MLGW truck passed by when I went in my house

Dry By

Black Chrysler Truck like my mom Tag 640 BKMS Woman 50ish Black thin

Driving toward MLGW

Airplane

CJ phone recording in front window

Waiting until I start moving around with the phone

6-3-2024 9:16 am

MLGW Started tinting the windows

Informants - Intimidation and Retaliation

I had my back towards MLGW smoking and this BHX 5210 Black Truck Red shirt black Female she staring and watching at me

MLGW came out the gate turning left little white electrical truck not 2 door regular security looking truck

Airplane 6-3-2024 9:19 am

9:26 am

Over my house

93774 Light and dark navy blue (not bright) Truck Tinted Windows

Airplane 6-3-2024 9:46 am

Airplane 6-3-2024 10:00 am

Airplane 6-3-2024 10:14 am

Airplane 6-3-2024 10:38 am

6-3-2024 10:40 am

Train at Poplar Avenue

I'm going to downtown

Family Dollar refused to sell me bread Sliced bread

Hostess male young worker black sat in the truck until we came out the store

6-3-2024 10:41 am

Helicopter fly over

Turned off all devices except the Southwest TN laptop

6-3-2024 10:58 am _Followed and looked for - Police and Black Truck

Police sirens start in my proximity to find me since all the cells are off

Walked out the door to get a audio of the police sirens and black truck pulled down Tupelo after I opened my door.

The siren stopped after I videoed the four door no tint black big truck Extra big F150 or F550

10:59 am Recorder Sounds in home

I just heard a high pitch beep but I cannot find where it is coming

The second time I heard it once but let it go. It sounds like my camera on the phone when I stop recording something

Regular white truck

11:01 am White truck with a man wearing an orange shirt hanging out the window Tupelo to Hollywood

11:02 am Another car came from Hollywood to Tupelo (didn't see who it was)

6-3-2024 at home All electronics are on airplane mode

All cars passing stop or hunk at the neighbor as I came out Wayne Wallace came out

Neighbor came out

Helicopter 11:14 am

Airplane 11:15 am

Airplane 11:17 am

Cars increase coming by

Airplane 11:19 am

Airplanes fly over house so I cannot see what plane it is

MLGW truck Altec came by

3508 and another missed it but this what truck four door long

Airplane mode is still on the phones

Airplane 6-3-2024 11:23 am

Flying very low

MLGW 5242 Mexican driving and a white man passing my house as I check the water in car. You cannot see me from the street unless you drive by

Airplane 6-3-2024 11:33 am

Blue Accent four door maybe

6-10-2024

MLGW watching my house

White pick-up truck two 12:36 pm



FedEx Express Alert line

866-423-3339

Mrs. Mitchell from Mitchell on Novax unaffiliated and other third parties take complaints

6-11-2024

Texted a friend

I walked to B52 Mart Eldridge & Hollywood

1:10 pm approximately

Home 1:30 pm approximately

Mail truck passed by as I went to B52 Mart

Mail truck passed by as I went left

Got home and friend pulled up

Helicopter (blue & white) flew over and the Wayne neighbor came home with baby mama

Put in a report request for the helicopter footage ob 6-11-2024 between 1:30 pm & 1:41 pm

worked with John, white male cashier, during entire shifts but was reduced to 30 minutes maximum on register or him leaving as I come to work along with Zoe, Trevor, Marc, Whali, Camron, and other workers. Angela and Jessica came by again at 12:17 and again at 12:18 pm. Vicky, black female worked register 2. Daria, Black female, worked register 4. No one wash in floral although that is where Jessica works normally with Scott, Stephanie, Paulina, and Jasmine Malone of floral. Jessica never worked the register just everywhere I am she comes but doesn't speak unless I speak to her. She immediately leaves me as if she is rejecting conversation with me. At 12:20 pm an African American worker female from the bakery came by being intimidating with her presence.

Intimidation walking by me all the day

March 28, 2024, around 12:22 Vicky from the bakery came by looking. Kadarius, a corporate employee overseeing the construction work made sure I saw him. 12:23 pm Sara Russell, white female, and was removed from the registers when I worked. White workers, clean looking Spanish speakers work in floral full time. work in the floral department. were to work without blacks workers. At 12:23 Angela came walking by me intimidating me. She is a cashier but was not working the register. At 12:25 pm a white male construction worker came walking by me. Whitney, bakery manager African American female, came by the front of my register walking and looking at me turning up her lip 12:28 pm. Minutes later Bill, white male baggar, came by me with his gun showing on his hip showing intimidation. 12:33 pm ~~John, white male cashier, over the intercom to keep him away from working with me. 1:18 pm Andrea, LaTanya, Kimberly Johnson the security guard, and Vicky (white female) gathered in conversation where I could see. 1:20 pm I walked to the ice machine by register 6 and LaTanya Owens, Andrea, and Jessica , white female from the Mississippi walked away. Kimberly Johnson the security guard from Clarion Security at 12:45 pm. At 12:48 pm Anita came back walking by. Then Kimberly Johnson the security guard from Clarion Security at 12:45 pm. 12:50 pm Scott the floral manager, white male, came walking~~

In Quince Road's manager's office above customer service with a door to close, around 3:6 pm on March 27, 2024 J. R. said I was being transferred and it was not up for debate. J.R. of human resources said I would be closer to my house, but I was working one minute from my son's school, three minutes from my daughter, and in an emergency, they could be picked up by me in a matter of minutes. Each have an immune system that gets very weak at times. Nose bleeds, diagnosed allergic to grass, dog hair, cat hair wheats, and more. Being near my kids who had just come out of homeschooling needed to be near my job. They come get money to eat after school just like Kandis Banks' kids, Kimberly Johnson's (white female, older - works only in customer service until the harassment daughters and grandchildren. Andrea is a manager but Kandis Banks was picking up, dropping off, and mingling with their kids while still on the clock.

J.R. the human resources manager said SuperLo Foods on Watkins Street had a high need for workers. He said it was a fresh start. I said LaTanya and Jeremy just hired new workers and brought a white female worker named Jessica to Quince Road in March 2024, John Pope was available to go, Angela Myers, Kandis Banks, Kimberly Venegas, the new hire young lady Jasmine Malone all could go help the understaffed store. J.R. stopped me saying this isn't up for debate. Quince Road. J.R. said Watkins needed help but Watkins had an overflow of scheduled people. I was not needed.

LaTanya had tried to get me to quit when I made the complaint relating Angel Myers wrapping her arms around me and leaning while I checked out customers.

When I asked about a different position J.R. said the best way for me to move up the ladder was stocking and grocery but Kimberly Venegas (Quince Road location did not, Quince Road location Javier did not, nor did Lisa from the Watkins location.

On or around, March 28, 2024, around 12:13 pm Angela came walking by noon or prior. Titana left her register at 12:15 pm. John is a cashier but after I made the complaint against Banks and managers, I was not allowed to work with him but around three weeks prior to being transferred to another location. I

complaint letter from March 1st

message

quinta Partee <le.partee@gmail.com>
"jr@superlofoods.com" <jr@superlofoods.com>

Fri, Mar 1, 2024 at 2:13

On March 1st 2024 I was aggressively bumped from behind by Lola around 2:11 pm. I want to file this complaint as retaliation for reporting her 1 my first complaint and for filing against Kandis Banks.

Sexual harassment and retaliation

message

quinta Partee <le.partee@gmail.com>
jr@superlofoods.com, accounting@superlofoods.com

Mon, Mar 4, 2024 at 10:29

On Sun, Mar 3, 2024, 9:12 PM Laquinta Partee <le.partee@gmail.com> wrote:

Today 3-3-24 At 12:01 pm I was wrapped around from behind by the arms of Angela.

I am being given a schedule that stops me going to class unlike Laterica who works day shift, Kandis get a schedule approved that is set around times that give them time to go their classes, and Marc the cashier. I was made to not only do my work but managers duties by Kim who is tall with blonde hair who took a register behind and did not say anything to Angela when I was wrapped up by her nor after I told Angela to never do it again.

I feel this is retaliation and discrimination because I am a older Black female that has made a sexual harassment complaint against Kandis Banks.

Please confirm you have received the email.